

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO  
AMERICAN POSTAL WORKERS UNION INTERROGATORY  
(APWU/USPS-T6-1)**

The United States Postal Service hereby provides its response to the above-listed interrogatory of the American Postal Workers Union (APWU) dated January 27, 2012. The interrogatory is stated verbatim and is followed by the response. The response to APWU/USPS-T6-2 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
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## **RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T6-1.** What is the estimated increase/reduction in operating miles of Plant to Plant and Plant to Post Office transportation due to the 2009-2011 consolidations? Please provide all data and supporting analyses used to determine the average percent reduction or increase.

### **RESPONSE:**

The responsive data are provided in the spreadsheet attached to this response, labeled "Resp.APWU.T6.1.xls". The input data for this spreadsheet are the current and proposed mileage data contained in Area Mail Processing (AMP) proposals or Post Implementation Reviews (PIR). As information, each AMP consolidation proposal is subject to a review process that includes an Initial Study and two Post Implementation Reviews (PIRs). At each stage of this process, the current and proposed mileage is evaluated and summarized in a report. My spreadsheet contains data from the most recent report completed for a specific AMP, provided that such report was completed between January 1, 2009 through December 31, 2011. These reports are contained in Library Reference USPS-LR-N2012-1/NP12.

The attached spreadsheet contains, for each consolidation, the following information: the type of report that was analyzed, the fiscal year the relevant report was completed, the type of consolidation, the date of the report, the names of the losing and gaining facilities, the total operating miles impacted by the consolidation, the "Plant-to-Plant" operating miles impacted by the consolidation, and the "Plant-to-Post Office" operating miles impacted by the consolidation. To compute the overall increase or reduction in operating miles for each consolidation, I subtracted the sum total of current operating miles from the sum total of proposed operating miles for the losing and gaining facilities under

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**RESPONSE TO APWU/USPS-T6-1 (CONT.):**

review. A negative number (-) in the “Total Miles Impact” column indicates a reduction in operating miles. Routes serviced by Highway Contract Route (HCR) service and Postal Vehicle Service (PVS) were included in my analysis.

To determine whether the operating miles on a particular route were part of the “Plant-to-Plant” network or “Plant-to-Post Office” network, I matched the HCR Id. No. for each route to its assigned budget account number in the transportation database. Budget account numbers are financial accounting descriptors used to distinguish the categories of transportation mentioned in my testimony. See USPS-T-6 at 4. Plant-to-Plant routes are those that fall within the following transportation categories: Inter-Area, Inter-Cluster, and Inter-P&DC. Plant-to-Post Office routes are those that fall within the Intra-P&DC transportation category. PVS routes are also considered Plant-to-Post Office routes.